

REMARKS

Claims 1-31 are currently pending. Claims 1, 9, 17, and 24 are independent claims. No claims have been cancelled or amended in this paper. Therefore, claims 1-31 remain pending.

In the Final Office Action, the Examiner finally rejected claims 1-31 on various grounds, including several new grounds of rejection that were not previously presented to Applicants. For the first time, claims 1-8 were rejected under 35 USC § 101 for allegedly being directed to non-statutory subject matter. Also for the first time, claims 9-16 were rejected under 35 USC § 112, second paragraph, as being indefinite. Claims 1, 4, 9, 12, 17-19, 24, and 27 were rejected under 35 USC § 103(a) as allegedly being unpatentable over Applicants' Background of the Invention, U.S. Patent Application Publication No. 20020138416 ("Applicants' Background"), in view of U.S. Pat. No. 6,266,655 to Kalyan ("Kalyan"). Claims 2, 3, 5-8, 10, 11, 13-16, 20-23, 25-26, and 28-31 were rejected under 35 USC § 103(a) as allegedly being unpatentable over Applicants' Background in view of Kalyan, further in view of U.S. Patent Application Publication No. 20020091699 ("Norton").

In view of the following arguments, all claims are believed to be in condition for allowance. Therefore, this response is believed to be a complete response to the Final Office Action. However, Applicants reserve the right to set forth further arguments supporting the patentability of their claims, including the separate patentability of the dependent claims not explicitly addressed herein, in future papers.¹ Further, for any instances in which the Examiner took Official Notice in the Office Action, Applicants expressly do not acquiesce to the taking of Official Notice, and respectfully request that the Examiner provide an affidavit to support the Official Notice taken in the next Office Action, as required by 37 CFR 1.104(d)(2) and MPEP § 2144.03.

1. As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

I. This Office Action Cannot Be Made Final.

This Office Action cannot be made final because the Examiner has introduced two new grounds of rejection, namely the rejections based on Sections 101 and 112. MPEP §706.07(a) states that an office action cannot be made final if “the examiner introduces a new ground of rejection that is neither necessitated by Applicants’ amendment of the claims, nor based on information submitted in an information disclosure statement.” (MPEP §706.07(a), emphasis added.) Applicants did not make any claim amendments or file an information disclosure statement. Additionally, these rejections have never been presented to Applicants before this Office Action. Applicants therefore respectfully request the Examiner to withdraw the finality of this Office Action.

II. Claims 1-8 Are Directed to Statutory Subject Matter Under Section 101.

For the first time in any Office Action, the Examiner rejected claims 1-8 under Section 101 as allegedly being directed to non-statutory subject matter. The Examiner did not rely on any recent case law to support his position, nor did the Examiner apply the PTO’s “Interim Guidelines for Examination of Patent Applications for Patent Subject Matter Eligibility” (October 26, 2005). Notably, the Examiner’s reasoning actually runs counter to the PTO’s Interim Guidelines. Based on the PTO’s Interim Guidelines and recent Federal Circuit case law, claims 1-8 are directed to statutory subject matter under Section 101 because the claimed invention as a whole accomplishes a practical application by producing a useful, concrete, and tangible result.

The Examiner’s analysis of patentable subject matter under Section 101 runs counter to the PTO’s own Section 101 Interim Guidelines. For example, the Examiner alleged that in order for a process to be patentable subject matter under Section 101, “[the] process must (1) be tied to another statutory class (such as a particular apparatus) or (2) transform underlying subject matter (such as an article or materials) to a different state or thing.” (Final Office Action, page 2.) The Examiner concluded by stating that “to qualify as a 101 statutory method, the claim should positively recite the other statutory class (the thing or product) to which it is tied.” (Final Office Action, page 3.) However, a process is patentable subject matter under Section 101. Further, the

PTO has specifically rejected the notion that a process must be tied to another statutory class or transform underlying subject matter to a different state or thing.

The PTO's Interim Guidelines state that "to be eligible for patent protection, the claimed invention as a whole must accomplish a practical application. That is, it must produce a 'useful, concrete and tangible result.'" (Interim Guidelines, page 1, citation omitted, citing *State Street Bank & Trust Co. v. Signature Financial Group Inc.*, 149 F. 3d 1368 (Fed. Cir. 1998) and *AT&T Corp. v. Excel Communications, Inc.*, 172 F.3d 1352 (Fed. Cir. 1999).) Notably, the PTO's Interim guidelines clearly state that "[t]he tangible requirement does not necessarily mean that a claim must either be tied to a particular machine or apparatus or must operate to change articles or materials to a different state or thing." (*Id.* at 21, emphasis added.) Clearly, the PTO's interpretation of Section 101 runs counter to the Examiner's requirement that "[the] process must (1) be tied to another statutory class (such as a particular apparatus) or (2) transform underlying subject matter (such as an article or materials) to a different state or thing." (Final office Action, page 2.)

Additionally, claims 1-8 recite patentable subject matter because the claimed invention as a whole accomplishes a practical application by producing a "useful, concrete and tangible result." For example, claim 1 recites in part "inventorying a plurality of assets," which is a practical application that produces a "useful, concrete and tangible result," as required by the PTO's Interim Guidelines. Therefore, Applicants respectfully request that the Examiner withdraw the Section 101 rejections of claims 1-8.

III. Claims 9-16 Are Not Indefinite.

For the first time in any Office Action, the Examiner rejected claims 9-16 under Section 112, second paragraph, as being indefinite. The Examiner's entire rejection states that "[t]he 'means' recited in claims 9-16 appear to be directed to software. Meanwhile, the preamble of claims 9-16 are directed to [a] 'system,' but the body of claims 9-16 do not recite any structural limitations that constitute the claimed system. It is not really clear to the examiner what the applicant is trying to claim." (Final Office Action, page 3, emphasis added.) The Examiner continued by stating that "[t]hese rejections can be overcome by adding CPU in the claims." (*Id.*)

Applicants do not fully understand the Examiner's rejection, or how reciting a "CPU" somewhere in the claims will overcome the rejection. Claim 9 is an independent claim that utilizes means-plus-function language in compliance with Section 112, paragraph 6. Claim 9 recites:

A system for assessing and/or managing risks for an organization, comprising:

- (a) means for identifying and storing a plurality of assets of the organization, wherein each asset is defined to be one of an electronic asset type and a location asset type, and wherein the electronic asset type includes computers and networking equipment therefore and the location asset type includes physical locations where the electronic asset types are placed;
- (b) means for identifying a plurality of criteria, each criterion defining a security objective of the organization;
- (c) means for identifying a plurality of inventoried assets that relate to each identified criterion; and
- (d) means for formulating one or more metric equations for each identified criterion, each metric equation being defined, in part, by the one or more identified assets, wherein each metric equation yields an outcome value when one or more measurements are made relating to the identified assets, thereby allowing a user to assess the risk to the organization based on the measured values of the one or more metric equations.

As stated in Section 112, paragraph 6, "[a]n element in a claim for a combination may be expressed as a means or step for performing a specified function without the recital of structure, material, or acts in support thereof." (35 USC § 112, ¶6, emphasis added.) The Examiner's

argument seems to be that “the body of claims 9-16 do not recite any structural limitations that constitute the claimed system.” However, as plainly stated in Section 112, there is no need to recite any structure. Therefore, claims 9-16 are proper, and reciting a CPU is not required.

Notably though, the Examiner alleged that claims 9-16 are indefinite. However, the Examiner did not argue that the claims were indefinite and made no suggestion of which portion of the claims might be construed as indefinite. As the Examiner apparently understood, the recited “means” in claims 9-16 can be a CPU, which is certainly not indefinite. Therefore, Applicants respectfully request that the Examiner fully support this Section 112 rejection in the next Office Action, or withdraw the rejection of claims 9-16.

IV. Independent Claims 1, 9, 17, and 24 Are Patentable Over Applicants’ Background And Kalyan.

Independent claims 1, 9, 17, and 24 were rejected under Section 103(a) as allegedly being unpatentable over Applicants’ Background in combination with Kalyan. However, Applicants’ Background is merely background information, and does not teach or suggest numerous recitations found in Applicants’ claims, as discussed in detail below.

- A. “inventorying a plurality of assets of the organization, wherein each asset is defined to be one of an electronic asset type and a location asset type . . . and the location asset type includes physical locations where the electronic asset types are placed”**

Independent claims 1, 9, 17, and 24 each recite in part “inventorying a plurality of assets of the organization, wherein each asset is defined to be one of an electronic asset type and a location asset type . . . and the location asset type includes physical locations where the electronic asset types are placed.” The Examiner alleged that the “Inventory and definition” section of Applicants’ Background teaches this recitation. (Final Office Action, page 4.)

Applicants previously argued that Applicants’ Background says nothing at all about “a location asset type [that] includes physical locations where the electronic asset types are placed.” The Examiner responded by citing a statement in paragraph 15 of Applicants’ Background to rebut Applicants’ arguments. Specifically, the Examiner relies on the following from Applicants’ Background: “[i]n order to measure the theoretical impact of a risk, the organization

determines its assets (e.g., electronic devices, electronically stored data, etc.) that are involved in support of critical processes.” (Applicants’ Background: page 4, lines 11-13.)

However, this one sentence says nothing at all about how “each asset is defined to be one of an electronic asset type and a location asset type . . . and the location asset type includes physical locations where the electronic asset types are placed.” Additionally, Applicants’ Background says nothing at all about a location asset type that includes the physical location of an electronic asset. In addition, Applicants’ Background fails to teach or suggest that each asset is defined to be one of an electronic asset type and a location asset type.

Because Applicants’ Background fails to teach or suggest “inventorying a plurality of assets of the organization, wherein each asset is defined to be one of an electronic asset type and a location asset type . . . and the location asset type includes physical locations where the electronic asset types are placed,” the rejections of claims 1, 9, 17, and 24, and the claims that depend therefrom, should be withdrawn.

B. “identifying at least one criterion defining a security objective of the organization”

Independent claims 1, 9, 17, and 24 further recite in part “identifying at least one criterion defining a security objective of the organization.” The Examiner alleged that the “Vulnerability and threat evaluation” section of Applicants’ Background teaches this recitation. (Final Office Action, page 4.) Applicants previously argued that Applicants’ Background not only fails to teach or suggest at least this recitation of claims 1, 9, 17, and 24, but Applicants’ Background also teaches away from “identifying at least one criterion defining a security objective of the organization.” The Examiner responded by citing paragraph 17 of Applicants’ Background, arguing that the “Vulnerability and threat assessment are criteria defining a security objective of the organization.” (Final Office Action, page 7.)

However, Applicants’ Background says nothing at all about “identifying a criterion defining a security objective of the organization, but merely that various organizations promulgate criteria,” and sets of criteria, to use for vulnerability and threat evaluation. Further, Applicants’ Background states that “[v]ulnerability and threat assessment is typically performed

by an internal audit department or third party auditor using a set of assessment criteria.” (Applicants’ Background: page 5, lines 4-6.) Applicants’ Background teaches using a pre-defined set of criteria, as opposed to identifying at least one criterion defining a security objective of the organization. Therefore, Applicants’ Background actually teaches away from “identifying at least one criterion defining a security objective of the organization.”

Because Applicants’ Background not only fails to teach or suggest “identifying at least one criterion defining a security objective of the organization,” but also teaches away from this recitation, the rejections of claims 1, 9, 17, and 24, and the claims that depend therefrom, should be withdrawn.

C. “identifying one or more inventoried assets that relate to the identified criterion”

Independent claims 1, 9, 17, and 24 further recite in part “identifying one or more inventoried assets that relate to the identified criterion.” The Examiner alleged that the “Inventory and definition” section of Applicants’ Background teaches this recitation. (Final Office Action, pages 4-5.) Applicants previously argued that Applicants’ Background says nothing at all about “identifying one or more inventoried assets that relate to the identified criterion.” The Examiner responded by stating that Applicants’ Background “teaches identifying assets and assigning a value to each asset” in paragraph 15. However, Applicants’ Background not only fails to teach this recitation, but actually teaches away from “identifying one or more inventoried assets that relate to the identified criterion.”

Applicants’ Background says nothing at all about “identifying one or more inventoried assets that relate to the identified criterion.” The Examiner relied on the statement that “[o]nce assets have been identified, a value is assigned to each asset.” (Applicants’ Background: page 4, lines 13-14.) At most, Applicants’ Background suggests assigning a value to a previously identified asset. As stated in Applicants’ Background, “[t]his value is not only monetary, but also may be tied to loss of reputation or loss of trust.” (Applicants’ Background: page 4, lines 14-15.) This section says nothing at all about identifying an asset that relates to the identified criterion. At most, Applicants’ Background suggests that a value can be assigned to previously identified assets.

Further, Applicants' Background teaches away from "identifying one or more inventoried assets that relate to the identified criterion." Applicants' Background states that "the organization determines its assets . . . [then] a value is assigned to each asset." (Applicants' Background: page 4, lines 11-14.) A vulnerability and threat assessment is performed by an auditor to examine the organization for weaknesses that could be exploited by an unauthorized outsider. The auditor uses a set of assessment criteria to evaluate if vulnerabilities exist. (Applicants' Background: page 5, lines 1-9.) Applicants' Background teaches performing an inventory of assets, and then evaluating those assets using a set of criteria. Such a teaching is contrary to "identifying one or more inventoried assets that relate to the identified criterion." Therefore, if Applicants' Background is at all relevant, it actually teaches away from "identifying one or more inventoried assets that relate to the identified criterion."

Because Applicants' Background not only fails to teach or suggest "identifying one or more inventoried assets that relate to the identified criterion," but also teaches away from this recitation, the rejections of claims 1, 9, 17, and 24, and the claims that depend therefrom, should be withdrawn.

D. "assessing the risk to the organization based on the measured values of the one or more metric equations"

Independent claims 1, 9, 17, and 24 further recite in part "assessing the risk to the organization based on the measured values of the one or more metric equations." The Examiner alleged that Applicants' Background teaches this recitation, and relied on the statement that "[o]nce risk has been assessed and identified, the organization can choose to accept the risk, mitigate the risk, or transfer the risk." (Final Office Action, page 5.) However, Applicants' Background also fails to teach or suggest at least this recitation of claims 1, 9, 17, and 24.

At most, Applicants' Background suggests that once a risk has been assessed, an organization can make a decision as to whether to accept, mitigate, or transfer the risk. Applicants' Background says nothing at all about "assessing the risk to the organization based on the measured values of one or more metric equations." In fact, Applicants' Background does not in any way suggest using metric equations at all, much less "measured values of the one or more metric equations."

Because Applicants' Background fails to teach or suggest "assessing the risk to the organization based on the measured values of the one or more metric equations," the rejections of claims 1, 9, 17, and 24, and the claims that depend therefrom, should be withdrawn.

E. "formulating one or more metric equations for each identified criterion"

Independent claims 1, 9, 17, and 24 further recite in part "formulating one or more metric equations for each identified criterion." The Examiner admitted that Applicants' Background fails to teach or suggest this recitation of claims 1, 9, 17, and 24. (Final Office Action, page 5.) The Examiner then cited Kalyan, stating that "Kalyan disclosed the formulating and solving of equations for identified criteria," and pointed to Kalyan's Abstract and elements 42 and 44 of Figure 4. (Final Office Action, page 5.) The Examiner then alleged that "it would have been obvious to one of ordinary skill in the art to incorporate the teachings of Kalyan into [Applicants' Background Information] to formulate and solve metric equations defining one or more assets of the organization since doing so would provide answers to business organizational questions in a more efficient and systematic way." (Final Office Action, page 5.) Applicants previously argued that Kalyan fails to teach or suggest this recitation. The Examiner responded to Applicants' previous arguments by stating the following:

Kalyan discloses a method of valuing resources of an asset intensive manufacturer by setting up equations and solving each equation for the resource variables (see the abstract, also see fig.4 elements 43 and 44). The examiner contends that since identified criterion, as claimed by the applicant, is a measured variable, and since Kalyan teaches setting up and solving equations for measured variable (i.e., resources of an asset intensive manufacturer), Kalyan teaching certainly meets the applicant's claimed limitation of 'formulating one or more metric equations for each identified criterion.'" (Final Office Action, page 8.)

However, Kalyan not only fails to teach this recitation, but also is incapable of combination with Applicants' Background. Kalyan is directed to a method of "valuing resources of an asset intensive manufacturer." (Kalyan, Abstract.) Kalyan states that "[a]n example of an asset intensive manufacturing is steel manufacturing." (Kalyan: col. 2, lines 49-50.) Specifically, Kalyan states that "[t]he following description is directed to a computer-implemented tool that implements a 'value-management' (VM) pricing method . . . for use by asset intensive manufacturers." (Kalyan: col. 2, lines 20-23.) For example, Kalyan notes that

“[o]ne of the unique challenges of any manufacturing enterprise is valuation of its products and resources.” (Kalyan: col. 1, lines 20-21.) Clearly, Kalyan is not directed to the recitations found in Applicants’ claims, and cannot be combined with Applicants’ Background.

The Examiner alleged that Kalyan teaches “formulating one or more metric equations for each identified criterion” by relying on elements 42 and 44 of Figure 4. However, Figure 4 “illustrates how MAV [minimum acceptable values] equations are set up and solved.” (Kalyan: col. 2, lines 20-23.) Figure 4 is a flow chart, where element 42 is the second process step and states “calculate prorated values of product values on each resource used by a product.” Element 43 is the following process step and states “set up N_R equations each with only one variable, the corresponding λ .” Further, element 44 is the following process step and states “solve each equation using a binary tree to converge to a new λ for each equation.” (Kalyan, Figure 4.) Kalyan says nothing at all about “formulating one or more metric equations for each identified criterion.”

In sum, the cited sections of Kalyan disclose at most valuing products and resources with one equation per resource, not per criterion. Kalyan in fact teaches away from “formulating one or more metric equations for each identified criterion” by disclosing that “one equation [is] associated with each resource.” To the extent that “each identified criterion” may potentially require more than “one equation associated with each resource,” Kalyan teaches away from this recitation. Moreover, the differences between Kalyan and claims 1, 9, 17, and 24 further can be seen in context, at least because the modeling in Kalyan is for the purpose of “valuing resources used to manufacture products” (e.g. Kalyan, col.1, lines 43-45), without regard to “at least one criterion defining a security objective of the organization.”

At least because Kalyan fails to teach or suggest “formulating one or more metric equations for each identified criterion,” the rejections of claims 1, 9, 17, and 24, and the claims that depend therefrom, should be withdrawn.

V. Dependent Claims 4, 12, 19, and 27 Are Patentable Over Applicants' Background And Kalyan.

"wherein the plurality of assets are defined to be one of a user type, a user population type, a data type and a network type in addition to the electronic type and the location type, wherein the user type relates to an individual user and the user population type relates to a group of users"

Dependent claims 4, 12, 19, and 27 further recite in part "wherein the plurality of assets are defined to be one of a user type, a user population type, a data type and a network type in addition to the electronic type and the location type, wherein the user type relates to an individual user and the user population type relates to a group of users." The Examiner alleged that the "Inventory and definition" section of Applicants' Background teaches this recitation. (Final Office Action, page 5.)

At most, Applicants' Background suggests that an "organization determines its assets (e.g., electronic devices, electronically stored data, etc.) that are involved in support of critical processes." (Applicants' Background: page 4, lines 11-13.). Applicants' Background says nothing at all about "the plurality of assets are defined to be one of a user type, a user population type, a data type and a network type in addition to the electronic type and the location type, wherein the user type relates to an individual user and the user population type relates to a group of users." In fact, Applicants' Background makes no mention of "a user type, a user population type, a data type, [or] a network type."

Because Applicants' Background fails to teach or suggest "wherein the plurality of assets are defined to be one of a user type, a user population type, a data type and a network type in addition to the electronic type and the location type, wherein the user type relates to an individual user and the user population type relates to a group of users," the rejections of claims 4, 12, 19, and 27, and the claims that depend therefrom, should be withdrawn.

VI. Dependent Claims 5, 13, 20, and 28 Are Patentable Over Applicants' Background In Combination With Kalyan And Norton.

"establishing at least one relationship between the plurality of assets"

Dependent claims 5, 13, 20, and 28 further recite in part "establishing at least one relationship between the plurality of assets." The Examiner stated that Applicants' Background does not explicitly disclose this recitation, and cited Norton to compensate for the acknowledged deficiency of Applicants' Background. (Final Office Action, page 6.)

The Examiner alleged that Norton teaches this recitation on page 4, ¶¶ 85-90. (Final Office Action, page 6.) At most, Norton discloses a variety of "asset search options" that "enables a user not only to search for an asset, but also to view a range of detailed information about the selected asset." (Norton: page 4, ¶¶ 85-87.) Norton further discloses that "[t]he Asset tab 70 displays detailed asset information for the asset selected," and that such information may include the asset's serial number, tracking number, purchase order, manufacturer, model number, etc. (Norton: pages 4-5, ¶¶ 88-93.)

Applicants previously argued that the cited portions of Norton fail to teach or suggest "establishing at least one relationship between the plurality of assets." The Examiner responded by alleging that Figure 8 of Norton "clearly shows at least one relationship between the pluralities of assets." (Final Office Action, page 8.) However, Figure 8 of Norton is simply a screen shot of a website showing "an exemplary display resulting from the selection of the Option Tab." (Norton: page 2, ¶ 36.)

Norton not only fails to disclose "establishing at least one relationship between the plurality of assets," but actually makes no mention of this recitation at all. Because Norton fails to teach or suggest "establishing at least one relationship between the plurality of assets," the rejections of claims 5, 13, 20, and 28, and the claims that depend therefrom, should be withdrawn.

VII. Dependent Claims 6, 14, 21, And 29 Are Patentable Over Applicants' Background In Combination With Kalyan And Norton.

"linking a first asset defined to be in one asset type with a second asset defined to be in another asset type"

Dependent claims 6, 14, 21, and 29 further recite in part "linking a first asset defined to be in one asset type with a second asset defined to be in another asset type." The Examiner stated that Applicants' Background does not explicitly disclose this recitation, and cited Norton to compensate for the acknowledged deficiency of Applicants' Background. (Final Office Action, page 6.)

Again, the Examiner alleged that Norton teaches this recitation on page 4, ¶¶ 85-90. (Office Action, page 5.) At most, Norton discloses a variety of "asset search options" that allow a user to search for an asset, and view detailed information about a selected asset. (Norton: page 4, ¶¶ 85-87.) Applicants previously argued that the cited portions of Norton fail to teach or suggest "linking a first asset defined to be in one asset type with a second asset defined to be in another asset type." The Examiner responded by stating that Figure 1A of Norton "discloses a standardized asset database, wherein different asset types are inherently linked together." (Final Office Action, page 8.) However, Figure 1A of Norton does not teach or suggest this recitation, explicitly or inherently, contrary to the Examiner's suggestion. Norton states that Figure 1A "is a block diagram of one preferred embodiment of a hosted asset information management system according to the present invention as a standalone system." (Norton: page 2, ¶ 28.)

Norton fails to disclose "linking a first asset defined to be in one asset type with a second asset defined to be in another asset type," and actually makes no mention of this recitation at all. The Examiner's reliance on any inherent disclosure in Figure 1A is unfounded without additional explanation. Because Norton fails to teach or suggest "linking a first asset defined to be in one asset type with a second asset defined to be in another asset type," the rejections of claims 6, 14, 21, and 29, and the claims that depend therefrom, should be withdrawn.

VIII. Dependent Claims 7, 15, 22, And 30 Are Patentable Over Applicants' Background In Combination With Kalyan And Norton.

"linking a first asset defined to be in one asset type with a second asset defined to be in the same asset type"

Dependent claims 7, 15, 22, and 30 further recite in part "linking a first asset defined to be in one asset type with a second asset defined to be in the same asset type." The Examiner stated that Applicants' Background does not explicitly disclose this recitation, and cited Norton to compensate for the acknowledged deficiency of Applicants' Background. (Final Office Action, page 6.) Again, the Examiner alleged that Norton teaches this recitation on page 4, ¶¶ 85-90. (Final Office Action, page 6.) However, Norton says nothing at all about "linking a first asset defined to be in one asset type with a second asset defined to be in the same asset type," as Applicants previously argued. The Examiner responded by alleging that this recitation is inherently disclosed in Figure 1A of Norton. (Final Office Action, page 8.) However, for at least the reasons stated above with respect to dependent claims 6, 14, 21, and 29, Norton also fails to teach or suggest at least this recitation of dependent claims 7, 15, 22, and 30.

Because Norton fails to teach or suggest "linking a first asset defined to be in one asset type with a second asset defined to be in the same asset type," the rejections of claims 7, 15, 22, and 30, and the claims that depend therefrom, should be withdrawn.

CONCLUSION

All rejections have been addressed. In view of the above, the presently pending claims are believed to be in condition for allowance. Accordingly, reconsideration and allowance are respectfully requested and the Examiner is respectfully requested to pass this application to issue. It is believed that any fees associated with the filing of this paper are identified in an accompanying transmittal. However, if any additional fees are required, they may be charged to Deposit Account 18-0013, under order number 65632-0525. To the extent necessary, a petition for extension of time under 37 C.F.R. 1.136(a) is hereby made, the fee for which should be charged against the aforementioned account.

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